

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GRACE NEEBE, as administratrix of the
ESTATE OF LOUIS NEEBE, Deceased, and
GRACE NEEBE, in her own right,

Plaintiff,

v.

Case No: 2:19-cv-04934
Judge Joshua D. Wolson

RAVIN CROSSBOWS, LLC,
VENATICS, INC.,
COMPASS DIVERSIFIED HOLDINGS,
THE COMPASS GROUP,
VELOCITY OUTDOOR, INC., and
CROSMAN,

Defendants.

DEFENDANTS' MOTION TO SUBMIT SEALED EXHIBIT

Defendants Ravin Crossbows, LLC, Venatics, Inc., Compass Diversified Holdings, The Compass Group, Velocity Outdoor, Inc., and Crosman ("Defendants") respectfully move to file **Exhibit 6**, Plaintiffs' Expert, Dr. Stephen Batzer's Expert Report under seal. This motion is brought pursuant to the Honorable Joshua Wolson's Policies and Procedures, Rule 5.D., which provides that "no documents may be filed under seal without first obtaining leave."

Dr. Batzer's report contains Defendants' intellectual property, trade secrets, and confidential information subject to protective orders entered in other cases across the country. *See e.g., Cordy v. Ravin*, No. 18-CV-183, Wis. Cir. Court Branch 3, Portage County. Dr. Batzer was recently sanctioned for violating the *Cordy* order when he shared this confidential material with Plaintiffs' counsel in this case. So as not to violate the *Cordy* order, Defendants hereby move before this Court for leave to file **Exhibit 6**, Dr. Batzer's Report, under seal for this Court's review in connection with Defendants' *Daubert* Motion.

Accordingly, Defendants respectfully request leave to submit Dr. Batzer's report under seal for the Court's consideration. Pursuant to the Court's Policies and Procedures, Rule 5.D., Defendants will further submit to the Court courtesy copies of the aforementioned documents sought to be filed under seal for same-day delivery.

Dated: December 30, 2020

Respectfully submitted,

CLARK HILL, PLC



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CERTIFICATE OF SERVICE

I certify that the foregoing document was served upon all counsel of record via CMECF
on December 30, 2020.

/s/ Barry Sutton
Barry Sutton, Esq.